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**UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA**

Ms. J.P., et al.,

Plaintiffs,

v.

Merrick B. Garland,

U.S. Attorney General, et al.,,

Defendants.

Case No. 2:18-cv-6081-JAK-SK

STIPULATION OF DISMISSAL

Judge: Hon. John A. Kronstadt
Magistrate Judge: Steven Kim
Hearing: January 29, 2024

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18 purposes only
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1 IT IS HEREBY STIPULATED by and between the undersigned Plaintiffs and
2 Defendants, by and through their respective attorneys, as follows:

3 1. On December 11, 2023, the court in *Ms. L, et al. v. ICE, et al.*, Case No.
4 18-cv-429 (S.D. Cal) issued an order granting final approval of a class settlement and
5 certifying the settlement classes, and subsequently dismissing Plaintiffs' claims with
6 prejudice. *Id.* at ECF Nos. 727 and 730. The court in *Ms. L.* retained jurisdiction to
7 enforce the Settlement Agreement's terms and to review any future modifications to
8 the Settlement Agreement that the parties might enter into upon mutual agreement. *Id.*
9 at ECF No. 730.

10 2. Upon the execution of this Stipulation, Plaintiffs, having reviewed the
11 *Ms. L.* settlement, hereby release and forever discharge Defendants, their successors,
12 the United States of America, and any department, agency, or establishment of the
13 United States, and any officers, employees, agents, successors, or assigns of such
14 department, agency, or establishment, from any and all claims and causes of action
15 that Plaintiffs assert or could have asserted in this litigation, or which hereafter could
16 be asserted by reason of, or with respect to, or in connection with, or which arise out
17 of, the specific conduct on which this action is based, *i.e.*, the detention of noncitizen
18 parents who entered the United States on or after July 1, 2017, and who were detained
19 in immigration custody by the Department of Homeland Services and were separated
20 from their minor children who came to the U.S. border together.

21 3. Plaintiffs reserve the right to file a motion for attorneys' fees and costs in
22 connection with this litigation. ECF No. 334.

23 4. Execution of this Stipulation and its approval by the Court shall
24 constitute dismissal of this case with prejudice pursuant to Fed. R. Civ. P.
25 41(a)(1)(A)(ii).

26 5. The parties acknowledge that this Stipulation is entered into solely for the
27 purpose of settling and compromising any remaining claims in this action without
28 further litigation, and it shall not be construed as evidence or as an admission on the

1 part of Plaintiffs, Defendants, the United States, or their agents, servants, or
2 employees regarding any issue of law or fact, or regarding the truth or validity of any
3 allegation or claim raised in this action.

4 6. This Stipulation is binding upon and inures to the benefit of the parties
5 hereto and their respective successors and assigns.

6 7. If any provision of this Stipulation shall be held invalid, illegal, or
7 unenforceable, the validity, legality, and enforceability of the remaining provisions
8 shall not in any way be affected or impaired thereby.

9 8. This Stipulation shall constitute the entire agreement between the parties,
10 and it is expressly understood and agreed that this Stipulation has been freely and
11 voluntarily entered into by the parties hereto. The parties further acknowledge that no
12 warranties or representations have been made on any subject other than as set forth in
13 this Stipulation.

14 9. The persons signing this Stipulation warrant and represent that they
15 possess full authority to bind the persons on whose behalf they are signing to the
16 terms of the Stipulation.

17 10. This Stipulation may not be altered, modified, or otherwise changed in
18 any respect except in writing, duly executed by all of the parties or their authorized
19 representatives.

20 Date: December 22, 2023

21 Respectfully submitted,

22 By: /s/ Amy P. Lally

23 Amy P. Lally (SBN 198555)
24 SIDLEY AUSTIN LLP

25 Mark Rosenbaum (SBN 59940)
26 PUBLIC COUNSEL

27 *Attorneys for Plaintiffs*
28

1 Date: December 22, 2023

Respectfully submitted,

2 BRIAN M. BOYNTON
3 Principal Deputy Assistant Attorney
4 General
5 Civil Division
6 WILLIAM C. PEACHEY
7 Director
8 Office of Immigration Litigation
9 WILLIAM C. SILVIS
10 Assistant Director
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By: /s/ Sarah B. Fabian (with
permission)

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Attorneys for Defendants

SIGNATURE ATTESTATION

Pursuant to LR 5-4.3.4(a)(2)(i), I hereby attest that the concurrence in the filing of the document has been obtained from each of the other Signatories.

/s/ Amy P. Lally

Amy P. Lally

Attorneys for Plaintiffs

CERTIFICATE OF SERVICE

IT IS HEREBY CERTIFIED THAT:

I, Amy P. Lally, am a citizen of the United States and am at least eighteen years of age. My business address is 1999 Avenue of the Stars, 17th Fl., Century City, CA 90067. I have caused service of the Joint Status Report on all counsel of record, by electronically filing the foregoing with the Clerk of the District Court using its ECF System, which electronically provides notice. I declare under penalty of perjury that the foregoing is true and correct

Date: December 22, 2023

/s/ Amy P. Lally

Amy P. Lally